

**IN THE UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF MASSACHUSETTS**

THE HOLMES GROUP, INC.,

Plaintiff,

 \mathbf{v}_i

WEST BEND HOUSEWARES, LLC and
FOCUS PRODUCTS GROUP, LLC

Defendant.

CA No. 05-CV-11367-REK
(Alexander, M.J.)

UNOPPOSED MOTION TO ADMIT COUNSEL *PRO HAC VICE*

The undersigned, Erik Paul Belt, a member of the bar of this Court, moves pursuant to Local Rule 83.5.3(b) for the admission *pro hac vice* of Martin L. Stern and Charles A. Laff of the law firm Michael Best & Friedrich, LLP of Chicago, Illinois. Attorneys Stern and Laff will represent defendants West Bend Housewares, LLC and Focus Products Group, LLC.

As stated in the accompanying certificates (attached as Exhibits A and B, respectively), Attorneys Stern and Laff are members of the Bar of the State of Illinois, as well numerous federal bars, including the bars of the United States Court of Appeals for the Federal Circuit, the United States District Court for the Northern District of Illinois, and the United States Supreme Court. They are in good standing in every jurisdiction in which they have been admitted to practice. Also, there are no disciplinary proceedings pending against them as members of the bar in any jurisdiction, court, or agency. Attorneys Stern and Laff declare that they are familiar with the Local Rules of the United States District Court for the District of Massachusetts.

Lee Carl Bromberg and Erik Paul Belt, partners in the Boston law firm Bromberg & Sunstein LLP, are also appearing in this action on behalf of West Bend Housewares and Focus Products Group, LLC, and will continue to represent both companies as local counsel. Messrs. Bromberg and Belt are members in good standing of the bar of this Court.

The required admission fees for appearing *pro hac vice* (\$50.00 for each attorney, or \$100.00 total) will be sent to the Court by messenger today.

Plaintiff does not oppose the admission of Attorneys Stern and Laff.

ACCORDINGLY, Erik Paul Belt respectfully requests that Martin L. Stern and Charles A. Laff be admitted to the bar of this Court for purposes of the above-captioned action.

CERTIFICATE PURSUANT TO LOCAL RULE 7.1

I certify that, on August 22, 2005, counsel for the parties conferred by telephone in a good faith attempt to resolve or narrow the issues presented by this motion. Nicholas J. Nesgos, Esq., counsel for the Plaintiff, stated that Plaintiff does not oppose the admission of Attorneys Stern and Laff.

Dated: August 22, 2005

Attorneys for
West Bend Housewares, LLC
Focus Products Group, LLC

/s/ Erik P. Belt
Lee Carl Bromberg, BBO # 058480
Erik Paul Belt, BBO # 558620
BROMBERG & SUNSTEIN LLP
125 Summer Street
Boston, MA 02110
(617) 443-9292
ebelt@bromsun.com

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF MASSACHUSETTS**

| | | |
|-------------------------------|---|------------------------|
| THE HOLMES GROUP, INC., |) | |
| |) | |
| Plaintiff, |) | CA No. 05-CV-11367-REK |
| |) | (Alexander, M.J.) |
| v. |) | |
| |) | |
| WEST BEND HOUSEWARES, LLC and |) | |
| FOCUS PRODUCTS GROUP, LLC |) | |
| |) | |
| Defendant. |) | |

DECLARATION AND CERTIFICATE OF MARTIN L. STERN, ESQ.

I, Martin L. Stern, declare as follows:

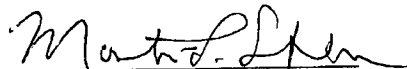
1. I am a partner in the law firm of Michael Best & Friedrich of Chicago, Illinois. I am admitted to practice before the Bar of the State of Illinois (Illinois Bar No. 02727307, admitted 1977) as well as the bars for the United States Supreme Court, the United States Court of Appeals for the Federal Circuit, the United States Court of Appeals of the 7th Circuit, and the United States District Court of the Northern District of Illinois. I am also registered to practice in the United States Patent and Trademark Office.

2. I am a member of the bar in good standing in every jurisdiction and court to which I have been admitted to practice. There are currently no disciplinary proceedings pending against me as a member of the bar in any jurisdiction, court, or agency. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

3. I am trial counsel for the defendants West Bend Housewares, LLC, 2845 Wingate Street, West Bend, Wisconsin 53095 and Focus Products Group, LLC, 120 Lakeview Pkwy.,

Vernon Hills, IL 60061. I represent both defendants in the above-captioned action, and I respectfully request admission to the Bar of this Court *pro hac vice*.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE
AND CORRECT. EXECUTED ON AUGUST 11, 2005


Martin L. Stern

Vernon Hills, IL 60061. I represent both defendants in the above-captioned action, and I respectfully request admission to the Bar of this Court *pro hac vice*.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS
TRUE AND CORRECT. EXECUTED ON AUGUST 22, 2005

/s/ Martin L. Stern
Martin L. Stern

EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF MASSACHUSETTS**

| | | |
|-------------------------------|---|------------------------|
| THE HOLMES GROUP, INC., |) | |
| |) | |
| Plaintiff, |) | CA No. 05-CV-11367-REK |
| |) | (Alexander, M.J.) |
| v. |) | |
| |) | |
| WEST BEND HOUSEWARES, LLC and |) | |
| FOCUS PRODUCTS GROUP, LLC |) | |
| |) | |
| Defendant. |) | |
| |) | |

DECLARATION AND CERTIFICATE OF CHARLES A. LAFF, ESQ.

I, Charles A. Laff, declare as follows:

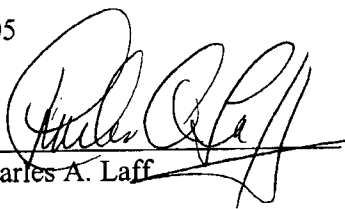
1. I am a partner in the law firm of Michael Best & Friedrich of Chicago, Illinois. I am admitted to practice before the Bar of the State of Illinois (Illinois Bar No. 01558153, admitted 1959) and the Bar of the State of Florida (Florida Bar No. 0044847, admitted 1961) as well as the bars for the United States Supreme Court, the United States Court of Appeals for the Federal Circuit, the United States Court of Appeals of the 7th, 9th, and 11th Circuits, the United States District Court of the Northern District of Illinois, the United States District Court of the Eastern District of Michigan, the United States Court of the, Eastern District of Wisconsin, and the United States District Court of the District of Arizona. I am also registered to practice in the United States Patent and Trademark Office.

2. I am a member of the bar in good standing in every jurisdiction and court to which I have been admitted to practice. There are currently no disciplinary proceedings pending against me

the United States District Court for the District of Massachusetts.

3. I am trial counsel for the defendants West Bend Housewares, LLC, 2845 Wingate Street, West Bend, Wisconsin 53095 and Focus Products Group, LLC, 120 Lakeview Pkwy, Vernon Hills, IL 60061. I represent both defendants in the above-captioned action, and I respectfully request admission to the Bar of this Court *pro hac vice*.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE
AND CORRECT. EXECUTED ON AUGUST 22, 2005


Charles A. Laff

the United States District Court for the District of Massachusetts.

3. I am trial counsel for the defendants West Bend Housewares, LLC, 1100 Schmidt Road, PO Box 2780, West Bend, Wisconsin 53090 and Focus Products Group, LLC, 120 Lakeview Pkwy. Vernon Hills, IL 60061. I represent both defendants in the above-captioned action, and I respectfully request admission to the Bar of this Court *pro hac vice*.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS
TRUE AND CORRECT. EXECUTED ON AUGUST 22, 2005

/s/ Charles A. Laff
Charles A. Laff